

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DANIEL MEDINA and NIKITA GROSS,

Plaintiffs,

v.

PUBLIC STORAGE, INC., a Maryland Real  
Estate Investment Trust, WILLIS INSURANCE  
SERVICES OF CALIFORNIA, INC., a  
California Corporation, and PS ILLINOIS  
TRUST,

Defendants.

Civil Action No. 1:12-cv-00170

Honorable Charles R. Norgle, Sr.

**MOTION FOR EXTENSION  
OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendants Public Storage (incorrectly sued as Public Storage, Inc.) and PS Illinois Trust, by and through their undersigned counsel, hereby move the Court for an additional fourteen days to file their answer or otherwise plead. In support of their motion, Defendants state as follows:

1. Plaintiffs filed their Complaint with the Circuit Court of Cook County, Illinois on November 18, 2011.
2. Defendants were served with a Summons and Complaint on December 11, 2011. Defendants filed a Notice of Removal on January 10, 2012, making their responsive pleading due on or before January 17, 2012.
3. Due to business circumstances beyond Defendants' control, the case was not assigned out to counsel until roughly two weeks ago.
4. In addition, lead counsel for Defendants has been engaged in trial in the matter of *Alexander Johnson v. Carl Karcher Enterprises, Inc.*, California Superior Court, Los Angeles County, Case No. BC456861, before the Honorable Michelle R. Rosenblatt from January 9, 2012 through yesterday, January 18, 2012.

5. In order to ensure time for adequate investigation, Defendants require an additional two weeks, or until January 31, 2012, to file their answer or otherwise plead.

6. Defendants have not received any prior extensions of time to answer or otherwise plead.

7. On January 19, 2012, counsel for Defendants telephoned Plaintiffs' counsel, Carla Aikens, to confer regarding the request for an extension of time to file a responsive pleading. Plaintiffs' counsel initially agreed to the extension. Plaintiffs' counsel subsequently reneged on the agreement, now stating that Plaintiffs only agree to a 14-day extension of time to file an answer, but not any other responsive pleading.

WHEREFORE, Defendants respectfully request that the time for answering or otherwise plead be extended to January 31, 2012.

Dated: January 19, 2012

s/ Dean A. Dickie

Dean A. Dickie

MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.

225 West Washington Street, Suite 2600

Chicago, IL 60606

Phone: (312) 460-4227

Fax: (312) 460-4288

*Counsel for Defendants Public Storage and  
PS Illinois Trust*